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15

16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**

18 **EQUAL EMPLOYMENT OPPORTUNITY**  
19 **COMMISSION,**

Civil Action No. CV-05-3615-JF

20 **Plaintiff,**  
21 **and**

[Complaint Filed: September 8, 2005]

22 **SANDRA VARGAS, ESTHER**  
**HERNANDEZ, AND MARIVEL**  
23 **HERNANDEZ**

**STIPULATION TO EXTEND THE**  
**TIME TO FILE THE JOINT CASE**  
**MANAGEMENT CONFERENCE**  
**STATEMENT TO MAY 5, 2006 AND**  
**PROPOSED ORDER**

24 **Plaintiff, Intervenors**

25 **v.**

26 **HARMAN - CHIU, INC., d/b/a/**  
**KFC / TACO BELL, HARMAN**  
27 **MANAGEMENT CORPORATION, INC.,**  
**JORGE GARCIA, AND DOES 1-10**  
28

## 1 Defendants

2  
3 Plaintiff Equal Employment Opportunity Commission (“EEOC”), Plaintiff-Intervenor  
4 Sandra Vargas, Esther Hernandez, and Marivel Hernandez, and defendants Harman - Chiu, Inc.,  
5 d/b/a KFC/Taco Bell (“Harman - Chiu”), Harman Management Corporation, Inc., (Harman-  
6 Management) jointly submit this stipulation to extend the time in which to file the Joint Case  
7 Management Statement from April 28, 2006 to May 5, 2006. The Case Management Conference  
8 is set for May 12, 2006.

9 The EEOC, Plaintiff-Intervenors and Defendants have agree that an extension of  
10 dates is necessary for the reasons set out below.

- 11 1. No previous extensions of time to extend the time to file the Joint CMC  
12 Statement has been requested in this case.
- 13 2. The Defendants response to Plaintiff-Intervenor’s Complaint is due on  
14 May 17, 2006.
- 15 3. Plaintiff-Intervenor cannot anticipate the time parameters needed to  
16 prepare its case without reviewing the Defendants Answers to their  
17 Complaints or participating in the mediation.
- 18 4. Based on the numerous declarations recently produced to the Plaintiffs,  
19 Plaintiff EEOC anticipates that it will significantly change the time  
20 paramenters and the number of depositions needed to prosecute this case.
- 21
- 22 5. The parties are participating in a mediation on May 3, 2006.
- 23 6. The parties anticipated that this case may resolve itself.
- 24 7. A one week extension of time in which to file the Joint CMC Statement  
25 will not be prejudicial to the parties.

26 **E-filing concurrence:** I, Evangelina Fierro Hernandez, attorney for Plaintiff  
27 EEOC, attest that I have obtained the concurrence of Virginia Villegas, attorney for the  
28 Plaintiff Intervenors and Bruce Boehm, attorney for Defendants, for the filing of this

1 joint stipulation.

2  
3  
4 Dated: April 28, 2006

EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION

5 By \_\_\_\_\_/S/  
6 EVANGELINA FIERRO HERNANDEZ  
7 Attorneys for Plaintiff  
8 EQUAL EMPLOYMENT  
9 OPPORTUNITY COMMISSION

10 Dated: April 28, 2006

McKAY BURTON & THURMAN

11  
12 By \_\_\_\_\_/S/  
13 BRUCE J. BOEHM

14 Attorneys for Defendant  
Harman-Chiu

15 Dated: April 28, 2006

TALAMANTES VILLEGAS CARRERA  
LLP

16  
17 By \_\_\_\_\_/S/  
18 VIRGINIA VILLEGAS  
19 Attorneys for Plaintiff Intervenors

20 The Joint Case Management Statement is due on May 5, 2006.

21 It is so ordered.

22 IT IS SO ORDERED:

23  
24 Dated: May 2, 2006

25   
26 THE HONORABLE JEREMY FOGEL  
27 Federal District Court Judge  
28